IN THE UNITED STATES PATENT & TRADEMARK OFFICE

Application No.	:	10/682,298
Title	:	DETAIL-IN-CONTEXT LENSES FOR MULTI-LAYER IMAGES
Applicant	:	Zeenat Jetha, et al.
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REPLY BRIEF
(SUBSTITUTE APPEAL BRIEF)

Sir:

This Reply Brief (in the form of a Substitute Appeal Brief) is in response to: the Examiner's Answer mailed April 10, 2008; the Notice of Panel Decision from Pre-Appeal Brief Review mailed December 14, 2007; and, the Examiner's Final Office Action mailed August 6, 2007.

Please note that a Notice of Appeal and the appropriate fees were filed on October 26, 2007. The original Appeal Brief and the appropriate fees were filed on January 2, 2008. An amended Appeal Brief was filed on February 4, 2008 in response to the Patent Appeal Center Specialist's Notice of Non-Compliant Appeal Brief mailed January 25, 2008.

This Reply Brief, being in the form of a Substitute Appeal Brief, contains submissions under the following headings in the order set forth below:

I. Real Party in Interest
II. Related Appeals and Interferences
III. Status of Claims
IV. Status of Amendments
V. Summary of Claimed Subject Matter
VI. Grounds of Rejection to be Reviewed on Appeal
VII. Arguments
VIII. Claims Appendix
IX. Evidence Appendix
X. Related Proceedings Appendix

Please note that the final page of the Arguments submission bears the practitioner's signature.

I. REAL PARTY IN INTEREST

The real party in interest is Idelix Software Inc., the assignee of record.

II. RELATED APPEALS AND INTERFERENCES

None.

III. STATUS OF CLAIMS

The status of claims in this application is as follows:

1. Total Number of Claims in Application

There are 35 claims pending in this application, numbered 1-35.

2. Status of All of the Claims

A. Claims cancelled: None.

B. Claims withdrawn for consideration but not cancelled: None.

C. Claims pending: Thirty-five, namely, Claims 1-35.

D. Claims allowed: None.

E. Claims objected to: None.

F. Claims rejected: Thirty-five, namely, Claims 1-35.

3. Claims on Appeal

The claims on appeal are Claims 1 and 20.

IV. STATUS OF AMENDMENTS

None.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Please note that page, line, figure, and item references in the following summary are to the specification and drawings as originally filed.

With respect to presently rejected Claim 1, the claimed subject matter is a method for editing a multi-layer original image (page 23, lines 12-22) displayed on a display screen (**340** in FIG. 3; page 12, lines 7-12).

The method comprises the following steps:

> in response to receiving an indication to edit a region (**681** in FIG. 6; page 23, lines 21-22) of said original image (page 23, lines 12-22), distorting a portion of a first layer (**680** in FIG. 6; page 23, lines 16-18) of said original image (page 23, lines 12-22) to produce a distorted image (**680** in FIG. 6; page 23, lines 16-18) for said region (**681** in FIG. 6; page 23, lines 21-22), said distorted image (**680** in FIG. 6; page 23, lines 16-18) including a magnified region (**620** in FIG. 6; page 23, lines 16-18) having a magnification for said region (**681** in FIG. 6; page 23, lines 21-22) at least partially surrounded by an at least partially compressed region (**630** in FIG. 6; page 23, lines 16-18) where said magnification decreases to that of said original image (page 23, lines 12-22) to provide context for said magnified region (**620** in FIG. 6; page 23, lines 16-18) with respect to said original image (page 23, lines 12-22);
>
> overlaying said distorted image (**680** in FIG. 6; page 23, lines 16-18) on said region (**681** in FIG. 6; page 23, lines 21-22) in a second undistorted layer (**670** in FIG. 6; page 23, lines 14-15) of said original image (page 23, lines 12-22) to produce an overlaid image (**600** in FIG. 6; page 23, lines 12-22) and displaying said overlaid image (**600** in FIG. 6; page 23, lines 12-22) on said display screen (**340** in FIG. 3; page 12, lines 7-12) to replace display of said original image (page 23, lines 12-22), said distorted image (**680** in FIG. 6; page 23, lines 16-18) at least partially surrounded by non-overlaid portions (**670** in FIG. 6; page 23, lines 14-15) of said second undistorted layer (**670** in FIG. 6; page 23, lines 14-15) in said overlaid image (**600** in FIG. 6; page 23, lines 12-22); and,
>
> upon completion of editing of said overlaid image (**600** in FIG. 6; page 23, lines 12-22), selectively propagating edits (**710** in FIGS. 7 and 8; page 23, line 23 to page 24, line 14)

made to said first layer (**680** in FIG. 6; page 23, lines 16-18) through to said second undistorted layer (**670** in FIG. 6; page 23, lines 14-15) of said original image (page 23, lines 12-22).

With respect to presently rejected Claim 20, the claimed subject matter is a method for generating a presentation (**600** in FIG. 6; page 23, lines 12-22) of a region (**681** in FIG. 6; page 23, lines 21-22) of a multi-layer original image (page 23, lines 12-22) for display on a display screen (**340** in FIG. 3; page 12, lines 7-12).

The method comprises the following steps:

distorting a portion of a first layer (**680** in FIG. 6; page 23, lines 16-18) of said original image (page 23, lines 12-22) to produce a distorted image (**680** in FIG. 6; page 23, lines 16-18) for said region (**681** in FIG. 6; page 23, lines 21-22), said distorted image (**680** in FIG. 6; page 23, lines 16-18) including a magnified region (**620** in FIG. 6; page 23, lines 16-18) having a magnification for said region (**681** in FIG. 6; page 23, lines 21-22) at least partially surrounded by an at least partially compressed region (**630** in FIG. 6; page 23, lines 16-18) where said magnification decreases to that of said original image (page 23, lines 12-22) to provide context for said magnified region (**620** in FIG. 6; page 23, lines 16-18) with respect to said original image (page 23, lines 12-22); and,

overlaying said distorted image (**680** in FIG. 6; page 23, lines 16-18) on said region (**681** in FIG. 6; page 23, lines 21-22) in a second undistorted layer (**670** in FIG. 6; page 23, lines 14-15) of said original image (page 23, lines 12-22) to generate said presentation (**600** in FIG. 6; page 23, lines 12-22), said distorted image (**680** in FIG. 6; page 23, lines 16-18) at least partially surrounded by non-overlaid portions (**670** in FIG. 6; page 23, lines 14-15) of said second undistorted layer (**670** in FIG. 6; page 23, lines 14-15) in said presentation (**600** in FIG. 6; page 23, lines 12-22); and,

displaying said presentation (**600** in FIG. 6; page 23, lines 12-22) on said display screen (**340** in FIG. 3; page 12, lines 7-12).

In general, the invention is summarised in the presently pending claims.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1. Whether Claim 1 is unpatentable under 35 U.S.C. 103(a) over United States Patent No. 6,523,024 to Yajima et al. ("Yajima") in view of "The Digital Magazine of InfoVis.net: Focus + Content" by Juan C. Dursteler ("Dursteler"), United States Patent Application Publication No. 2002/0044154 by Baar et al. ("Baar"), and United States Patent Application Publication No. 2003/0052896 by Higgins et al. ("Higgins").

2. Whether Claim 20 is unpatentable under 35 U.S.C. 103(a) over Yajima in view of Dursteler, Baar, and Higgins.

VII. ARGUMENTS

This section contains submissions under the following subheadings in the order set forth below:

A. Grouping of Claims

B. Statement of Law
  1. Claim Rejections Under 35 U.S.C. 102 - Anticipation
  2. Claim Rejections Under 35 U.S.C. 103 - Obviousness

C. Applicant's Arguments With Respect To Each Ground Of Rejection To Be Reviewed On Appeal
  1. Whether Claim 1 is unpatentable under 35 U.S.C. 103(a) over United States Patent No. 6,523,024 to Yajima et al. ("Yajima") in view of "The Digital Magazine of InfoVis.net: Focus + Content" by Juan C. Dursteler ("Dursteler"), United States Patent Application Publication No. 2002/0044154 by Baar et al. ("Baar"), and United States Patent Application Publication No. 2003/0052896 by Higgins et al. ("Higgins").
  2. Whether Claim 20 is unpatentable under 35 U.S.C. 103(a) over Yajima in view of Dursteler, Baar, and Higgins.

A. Grouping of Claims

The claims under appeal are independent Claims 1 and 20. There are two groups of claims. The first group of claims includes a single claim, namely, Claim 1, which rises or falls by itself. The second group of claims includes a single claim, namely, Claim 20, which rises or falls by itself.

B. Statement of Law

1. Claim Rejections Under 35 U.S.C. 102 - Anticipation

There are presently no outstanding rejections in this matter under 35 U.S.C. 102.

2. Claim Rejections Under 35 U.S.C. 103 - Obviousness

Statement of the Law

MPEP Section 2143: Examples of Basic Requirements of a *Prima Facie* Case of Obviousness

The Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, ___, 82 USPQ2d 1385, 1395-97 (2007) identified a number of rationales to support a conclusion of obviousness which are consistent with the proper "functional approach" to the determination of obviousness as laid down in *Graham*. The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit.

Exemplary Rationales

Exemplary rationales that may support a conclusion of obviousness include:

(A) Combining prior art elements according to known methods to yield predictable results;

(B) Simple substitution of one known element for another to obtain predictable results;

(C) Use of known technique to improve similar devices (methods, or products) in the same way;

(D) Applying a known technique to a known device (method, or product) ready for improvement to yield predictable results;

(E) "Obvious to try" – choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success;

(F) Known work in one field of endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations are predictable to one of ordinary skill in the art;

(G) Some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.

MPEP Section 2143.03: All Claim Limitations Must Be Considered

"All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

C. Applicant's Arguments With Respect To Each Ground Of Rejection To Be Reviewed On Appeal

1. Whether Claim 1 is unpatentable under 35 U.S.C. 103(a) over United States Patent No. 6,523,024 to Yajima et al. ("Yajima") in view of "The Digital Magazine of InfoVis.net: Focus + Content" by Juan C. Dursteler ("Dursteler"), United States Patent Application Publication No. 2002/0044154 by Baar et al. ("Baar"), and United States Patent Application Publication No. 2003/0052896 by Higgins et al. ("Higgins").

First: On pages 3-4 of the Final Office Action mailed August 6, 2007 (the "Final Office Action") the Examiner has rejected independent Claim 1 under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 6,523,024 to Yajima et al. ("Yajima") in view of "The Digital Magazine of InfoVis.net: Focus + Content" by Juan C. Dursteler ("Dursteler"), United States Patent Application Publication No. 2002/0044154 by Baar et al. ("Baar"), and United States Patent Application Publication No. 2003/0052896 by Higgins et al. ("Higgins").

On pages 3-4 of the Final Office Action the Examiner states the following concerning Yajima (underlining added):

> "Regarding independent claim 1, Yajima teaches a method for editing a multi-layer original image displayed on a display screen (Figure 19), comprising in response to receiving an indication to edit a region of said original image (column 7, line 56 – column 8, lines 9: information lens and magnifying lens functions), distorting a portion of a first layer of said original image to produce a distorted image for said region (column 7, line 56 – column 8, lines 9: the second image information is displayed in a form modified), said distorted image including a magnified region having a magnification for said region (Figure 19: the box representing a magnified view of the second image information)...Yajima teaches overlaying said distorted image on said region (column 7, line 56 – column 8, lines 9: the second image information) in a second undistorted layer (column 7, line 56 – column 8, lines 9: the first image information) of said original image to produce an overlaid image and displaying said overload image on said display screen to replace display of said original

image (Figure 19), said distorted image at least partially surrounded by non-overlaid portions of said second undistorted layer in said overlaid image (figure 19)."

FIG. 18 of Yajima is closely related to FIG. 19 of Yajima. Both of these figures are reproduced below for reference (high-lighting arrows and reference numbers added).

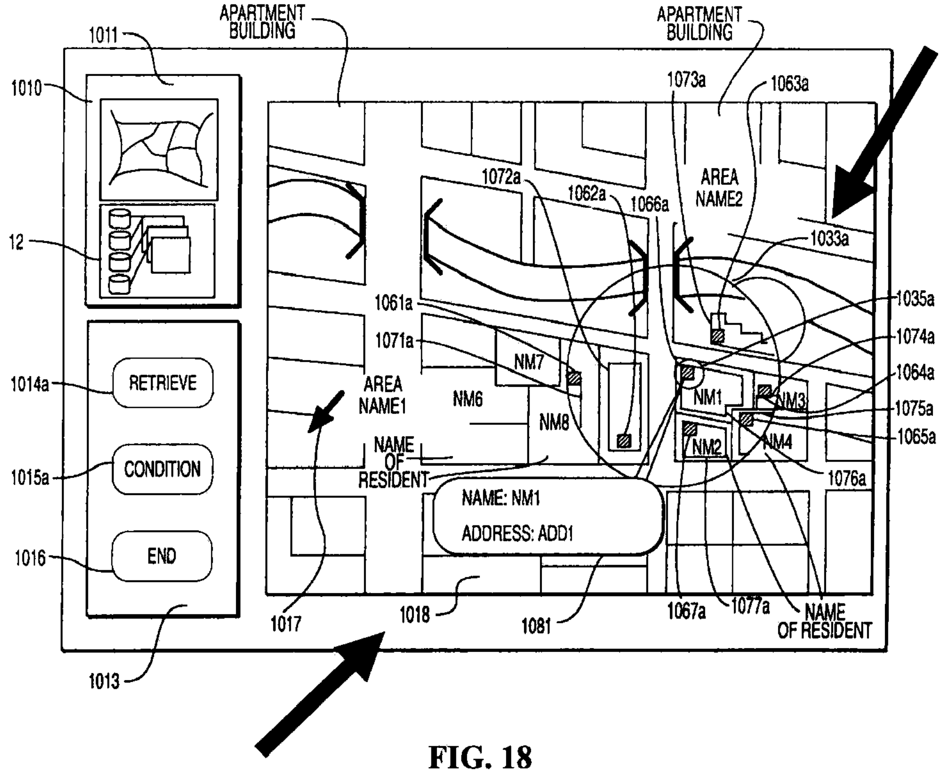

FIG. 18

What FIG. 18 of Yajima shows is a presentation having a "first image information" **1018** and a "second image information" **1033a**. The first image information **1018** and the second image information **1033a** are shown at the same level of magnification in FIG. 18. However, the second image information **1033a** includes more detail (i.e., items **1071a** to **1077a**) than the first image information **1018**.

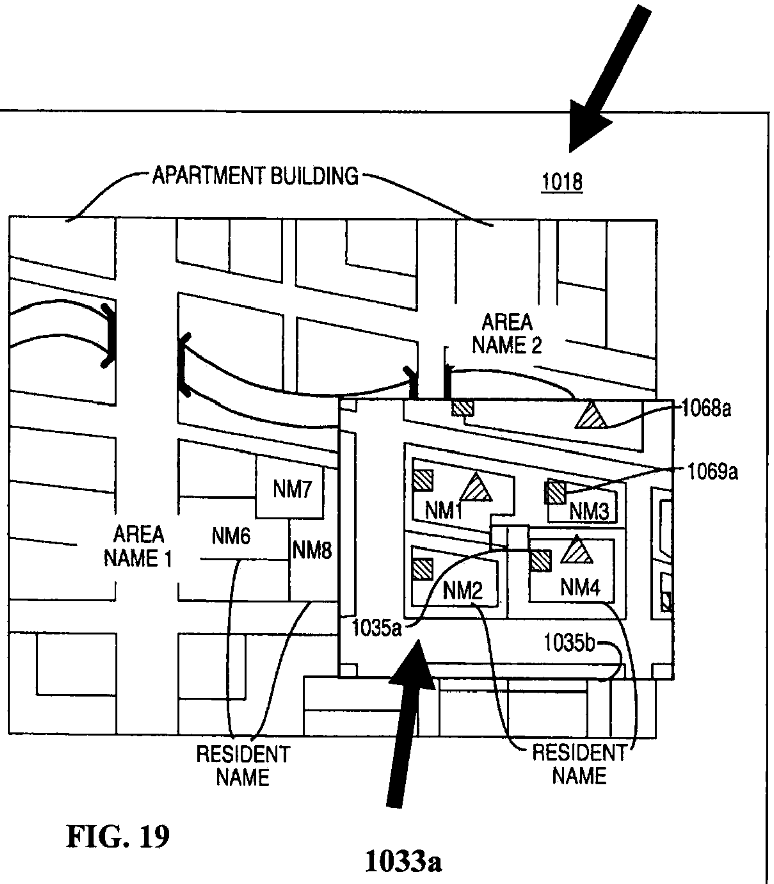

FIG. 19

What FIG. 19 of Yajima shows is a presentation also having the first image information **1018** and the second image information **1033a**. In FIG. 19, the second image information **1033a** is magnified and includes even more detail (i.e., items **1068a** and **1069a**) than is shown in the second image information **1033a** of FIG. 18. In FIG. 19, the second image information **1033a** appears as an inset magnifier.

The first and second image informations **1018, 1033a** simply present different levels of detail of the same original image or layer. That is, the second image information **1033a** may present additional information (e.g., items **1068a** and **1069a**) recovered from a database for the area of the first image information **1018** that it covers. It is apparent from FIGS. 18-19 of Yajima that the first and second image informations **1018, 1033a** pertain to a single layer. In other words, the first and second image informations **1018, 1033a** do not present different layers of the same original image. The first and second image informations **1018, 1033a** are not a "first layer" and a "second undistorted layer" as recited in Claim 1.

As such, the Applicant respectfully submits that Yajima does not teach or suggest those elements of previous Claim 1 that recite: "distorting a portion of a first layer of said original image to produce a distorted image for said region"; "overlaying said distorted image on said region in a second undistorted layer of said original image to produce an overlaid image and displaying said overlaid image on said display screen to replace display of said original image, said distorted image at least partially surrounded by non-overlaid portions of said second undistorted layer in said overlaid image"; and, "upon completion of editing of said overlaid image, selectively propagating edits made to said first layer through to said second undistorted layer of said original image".

Therefore, the Applicant respectfully submits that Yajima, Dursteler, Baar, and Higgins do not teach or suggest the subject matter of Claim 1.

Consequently, the Applicant respectfully submits that Claim 1 is not obvious under 35 U.S.C. 103(a).

Second: On page 4 of the Final Office Action the Examiner states the following concerning Higgins and Claim 1

> "Higgins discloses whenever a chance occurs on one map, the system causes the same change to occur on the other map (paragraph 110). It would have been obvious to modify Yajima's system to modify one map and propagate changes to other maps."

However, Higgins does not pertain to image distortion. A search for the word "distort" within the text of the on-line version of Higgins found no hits. That is, Higgins does not even mention the word "distort" (or distorting, etc.). What Higgins pertains to is synchronizing map images.

Therefore, and noting that the "overlaid image" of Claim 1 includes a "distorted image", Higgins does not teach or suggest that element of Claim 1 that recites: "upon completion of editing of said overlaid image, selectively propagating edits made to said first layer through to said second undistorted layer of said original image".

Therefore, the Applicant respectfully submits that Yajima, Dursteler, Baar, and Higgins do not teach or suggest the subject matter of Claim 1.

Consequently, the Applicant respectfully submits that Claim 1 is not obvious under 35 U.S.C. 103(a).

Reply to Examiner's Answer: With respect to Claim 1, on pages 11-19 of the Examiner's Answer mailed April 10, 2008 (the "Examiner's Answer"), the Examiner responds to the two arguments presented by the Applicant above.

With respect to the Applicant's first argument (see pages 13-16 above), on pages 11-17 of the Examiner's Answer the Examiner states the following with respect to Yajima (underlining added):

> "...Examiner agrees that the first and second image information **1018**, **1033a** present different levels of detail of the same original image however, the examiner maintains that the first and second image information **1018**, **1033a** are different layers of the original image...
>
> ...It is clear from Yajima that an information lens has a lens area that signifies the area for the second image information to be display, and therefore there is an indication to edit a region. The information lens would be the circular region corresponding to the second image information **1033a** in Figure 18 and the rectangular region corresponding to the magnified second image information **1033a** in Figure 19...
>
> ...It is clear from Yajima that the second image information is overlaid on top of the first image information, and therefore there are at least two layers...
>
> ...It is clear from Yajima that the second image information is displayed in form modified so that the correspondence thereof to the first image information is recognizable, and therefore there is at least a first layer that is distorted...
>
> ...It is clear from Yajima, and appellant clearly point out that the second image information **1033a** is magnified with details (Figure 19), and therefore there is a first layer that is distorted that also includes a magnified region having a magnification...

> ...In Figure 19 of Yajima, the second image information **1033a** is clearly shown to be overlaid on top of the first image information **1018** and therefor there are at least two layers...
>
> ...Finally, it is clear from Yajima, and appellant clearly point out, that the second image information **1033a** has a magnified view at least part of the first image information **1018** (Figure 19), and therefore there is a first image information and the second image information that are part of the same image...
>
> ...Since Yajima clearly has an information lens that signifies the area to for the second image information, the first image information and the second image information are part of the same image, and the first image information and the second image information are different layers since the second image information is magnified with details and overlaid on top of the first image information with portions of only the first image information surround the second image information, Yajima teaches the claimed limitation above. Examiner notes that a process for distort can be reasonable interpreted as a magnification process."

In reply, the Applicant respectfully submits that "first layer" and the "second undistorted layer" recited in Claim 1 represent different layers (e.g., different layer types). This is apparent in the claim as the "distorted image" is not overlaid on the same "first layer of said original image" from which it was generated but rather is overlaid on "a second undistorted layer of said original image". Hence, the first layer and the second undistorted layer in Claim 1 are different layers (e.g., different layer types). One layer is the "first layer of the said original image" and the second layer is the "second layer of said original image".

In contrast, in Yajima, the first and second image informations **1018**, **1033a** are different views of the same layer. The difference between the first and second image informations **1018**, **1033a** is that the second image information **1033a** includes added information (e.g., items **1071a** to **1077a** appearing in FIG. 18 and items **1068a** and **1069a** appearing in FIG. 19) not appearing in the first image information **1018**. That is, the second image information **1033a** is a more detailed view and the second image information **1018** is a less detailed view of the same layer. That the first and second image informations **1018, 1033a** represent the same layer is apparent from FIG. 18 where the second image information **1033a** is shown without magnification and at its original location within the first image information **1018**. The additional information appearing in the second image information **1033a** is not the result of magnification (e.g., the second image information **1033a** is not magnified with respect to the first image information **1018** in FIG. 18), but rather it is the result of additional retrieval from a database. See col. 7, line 56 to col. 8, line 9 and col. 14, lines 11-60 of Yajima.

The Applicant respectfully submits that in Yajima, the first and second image informations **1018, 1033a** are of the same layer type. In particular, the first and second image informations **1018, 1033a** are both line drawings. The first and second image informations **1018, 1033a** would be of different layer types if, for example, the first image information **1018** was a line drawing and the second image information was a photograph. This, however, is not the case.

In addition, the Applicant respectfully submits that the Examiner may be confusing the step of overlaying to produce an overlaid image as recited in Claim 1 with an original image that has multiple layers.

Furthermore, the Examiner makes statements along the lines that "distortion" is the equivalent to "magnification". The Applicant respectfully submits that this is not correct. Yajima does not distort the original image to produce a "distorted image" as recited in Claim 1. Rather, Yajima provides undistorted or uniform magnification for the second image information **1033a** shown in FIG. 19 of Yajima. All that FIG. 19 of Yajima teaches is the superimposing of a magnified view (i.e., second image information **1033a**) over a non-magnified view (i.e., the first image information **1018**) of a single layer. Both the first and second image informations **1018, 1033a** remain undistorted in Yajima.

On page 17 of the Examiner's Answer, the Examiner equates the uniform magnification of Yajima to the distorting of Claim 1 stating: "Examiner notes that a process for distort can be reasonable interpreted as a magnification process." However, distortion is not the same as magnification. In

FIG. 19 of Yajima, the second image information **1033a** is magnified but it is not distorted. With respect to the difference between distortion and magnification, please compare the following selections from Webster's Encyclopedic Unabridged Dictionary (underlining added):

> "**magnify**...**1**. to increase the apparent size of, as a lens does. **2**. to make greater in actual size; enlarge: *to magnify a drawing in preparing a fresco*. **3**. to cause to seem greater or more important; attribute too much importance to; exaggerate: *to magnify one's difficulties*. **4**. to make more exciting; intensify; dramatize; heighten: *The playwright magnified the conflict to get his point across*. **5**. *Archaic*. to extol; praise: *to magnify the Lord*...**6**. to increase or be able to increase the apparent or actual size of an object, as a lens does...".

> "**distort**...**1**. to twist awry or out of shape; make crooked or deformed: *Arthritis had distorted his wrists*. **2**. to pervert; misrepresent: *to distort the facts*. **3**. *Electronics*. to reproduce or amplify (a signal) inaccurately by changing the frequencies or unequally changing the delay or amplitude of the components of the output wave..."

> "**distorted**...**1**. twisted; deformed; misshapen. **2**. misrepresented; altered; twisted out of true meaning: *He supported the lie with distorted facts*. **3**. mentally or morally twisted, as with an aberration or bias: *He has a distorted sense of values*..."

> "**distortion**...**1**. the act or an instance of distorting. **2**. the state of being distorted or the relative degree or amount by which something is distorted or distorts. **3**. anything that is distorted, as a sound, image, fact, etc. **4**. *Optics*. an aberration of a lens or system of lenses in which the magnification of the object varies with the lateral distance from the axis of the lens..."

From these selections it is apparent that the word "magnify" is not equivalent to the word "distort". In general, to magnify means to uniformly enlarge. On the other hand, to distort means to twist awry or out of shape, make crooked or deformed. The "distorting" of original Claim 1 means that the magnification is not uniformly applied. In contrast, in Yajima, the magnification is uniformly applied as shown in FIG. 19.

Note that the fourth definition of "distortion" above is particularly appropriate for Claim 1 and is supported by both the specification and dependent Claim 4. This definition is commonly used in imaging technology, as well as in photography, and digital imaging. Lens flaws such as spherical and chromatic aberrations are considered to cause "distortions" in an image, whereas an ideal "undistorted" image would be an image to which magnification has been uniformly applied (i.e., spatially and/or chromatically). Claim 1 pertains to the field of imaging and so this definition of distortion is appropriate.

With respect to the Applicant's second argument (see page 17 above), on pages18-19 of the Examiner's Answer the Examiner states the following with respect to Higgins and Yajima (underlining added):

> "...As discussed above, Yajima teaches a first image information that is undistorted and the second image information that is distorted...
> ...An annotation of an image can be reasonably interpreted as a distortion of an image since the image itself has been changed to be different than what the image was before the change. A simple and general edit to an image causes a distortion to an image..."

In reply, as discussed above, Yajima does not teach or suggest distortion.

In addition, the Examiner makes statements along the lines that "distortion" is the equivalent to "annotation". The Applicant respectfully submits that this is not correct. With respect to the difference between distortion and annotation, please compare the following selections from Webster's Encyclopedic Unabridged Dictionary with respect to annotation to the selections with respect to magnification quoted above (underlining added):

> "**annotate**...**1.** to supply with critical or explanatory notes; remark upon in notes: *to annotate the works of Bacon*...**2.** to make annotations or notes..."

> "**annotated**...supplied with or containing explanatory notes, textual comments, etc.: *an annotated edition of Milton's poetry*..."

> "**annotation**...**1.** the act of annotating. **2.** a critical or explanatory note added to a text. **3.** note..."

Given the above, the Applicant respectfully reiterates that Yajima, Dursteler, Baar, and Higgins do not teach or suggest the subject matter of Claim 1. Consequently, the Applicant respectfully submits that Claim 1 is not obvious under 35 U.S.C. 103(a).

2. Whether Claim 20 is unpatentable under 35 U.S.C. 103(a) over Yajima in view of Dursteler, Baar, and Higgins.

On page 7 of the Final Office Action the Examiner has rejected independent Claim 20 under 35 U.S.C. 103(a) as being unpatentable over Yajima in view of Dursteler, Baar, and Higgins stating:

> "Regarding claims 20-23, 25, and 30-35, calims 20-23, 25, and 30-35 are similar in scope as to claims 1-4, 6, and 11-16, thus the rejections for claims 1-4, 6, and 11-16 hereinabove is applicable to claims 20-23, 25, and 30-35."

For the reasons given above with respect to Claim 1, the Applicant respectfully submits that the prior art references cited by the Examiner do not teach or suggest the subject matter of Claim 20. Consequently, the Applicant respectfully submits that Claim 20 is not obvious under 35 U.S.C. 103(a).

The Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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VIII. CLAIMS APPENDIX

1. A method for editing a multi-layer original image displayed on a display screen, comprising:
   in response to receiving an indication to edit a region of said original image, distorting a portion of a first layer of said original image to produce a distorted image for said region, said distorted image including a magnified region having a magnification for said region at least partially surrounded by an at least partially compressed region where said magnification decreases to that of said original image to provide context for said magnified region with respect to said original image;
   overlaying said distorted image on said region in a second undistorted layer of said original image to produce an overlaid image and displaying said overlaid image on said display screen to replace display of said original image, said distorted image at least partially surrounded by non-overlaid portions of said second undistorted layer in said overlaid image; and,
   upon completion of editing of said overlaid image, selectively propagating edits made to said first layer through to said second undistorted layer of said original image.

2. The method of claim 1 wherein said distorting further includes applying a distortion function to said portion of said first layer by displacing said portion onto said distortion function and projecting said displaced portion onto a plane.

3. The method of claim 2 wherein said applying further includes displaying a graphical user interface ("GUI") over said distorted image for receiving one or more signals for adjusting said distortion function.

4. The method of claim 3 wherein said distortion function includes a focal region corresponding to said magnified region and having an elevation to provide said magnification upon said projecting onto said plane and a shoulder region corresponding to said compressed region where said elevation decreases to provide said decreasing magnification upon said projecting onto said plane and said GUI includes at least one of:

means for adjusting said elevation and hence said magnification;
means for adjusting a degree of scooping for said distortion function;
means for adjusting an extent for said focal region;
means for adjusting an extent for said shoulder region;
means for adjusting a location for said distortion function within said first layer;
means for adjusting a location for an outline of said shoulder region within said first layer; and,
means for adjusting a location for said focal region relative to said shoulder region.

5. The method of claim 1 and further comprising receiving a signal for switching among said first and second layers.

6. The method of claim 1 and further comprising receiving a signal for selecting among said first and second layers.

7. The method of claim 1 and further comprising receiving a signal for selecting a folded distorted image in which said magnified region is repositioned.

8. The method of claim 7 wherein said folded distorted image further includes a second magnified region for said region in said second layer.

9. The method of claim 8 wherein said magnified region in said folded distorted region is repositioned by folding away from an original position relative to said compressed region to accommodate said second magnified region.

10. The method of claim 9 wherein said second magnified region is located at said original position and wherein said second magnified region has said magnification.

11. The method of claim 1 and further comprising receiving a signal for selecting a window for display within said magnified region.

12. The method of claim 11 wherein said window displays a portion of said second layer at said magnification.

13. The method of claim 3 wherein said one or more signals and said indication are generated with a pointing device.

14. The method of claim 1 wherein said first and second layers are one or more of raster, vector, point, and geo-referenced data layers.

15. The method of claim 1 wherein said indication, region, portion, first layer, distorted image, and second layer includes a plurality of indications, regions, portions, first layers, distorted images, and second layers, respectively.

16. The method of claim 4 wherein at least some of said means are icons.

17. The method of claim 1 and further comprising saving said edits for subsequent recall and application.

18. The method of claim 17 wherein said edits are saved as bookmarks.

19. The method of claim 18 wherein said editing includes applying said bookmarks.

20. A method for generating a presentation of a region of a multi-layer original image for display on a display screen, comprising:

distorting a portion of a first layer of said original image to produce a distorted image for said region, said distorted image including a magnified region having a magnification for said region at least partially surrounded by an at least partially compressed region where said magnification decreases to that of said original image to provide context for said magnified region with respect to said original image; and,

overlaying said distorted image on said region in a second undistorted layer of said original image to generate said presentation, said distorted image at least partially surrounded by non-overlaid portions of said second undistorted layer in said presentation; and,

displaying said presentation on said display screen.

21. The method of claim 20 wherein said distorting further includes applying a distortion function to said portion of said first layer by displacing said portion onto said distortion function and projecting said displaced portion onto a plane.

22. The method of claim 21 wherein said applying further includes displaying a graphical user interface ("GUI") over said distorted image for receiving one or more signals for adjusting said distortion function.

23. The method of claim 22 wherein said distortion function includes a focal region corresponding to said magnified region and having an elevation to provide said magnification upon said projecting onto said plane and a shoulder region corresponding to said compressed region where said elevation decreases to provide said decreasing magnification upon said projecting onto said plane and said GUI includes at least one of:

means for adjusting said elevation and hence said magnification;
means for adjusting a degree of scooping for said distortion function;
means for adjusting an extent for said focal region;
means for adjusting an extent for said shoulder region;
means for adjusting a location for said distortion function within said first layer;
means for adjusting a location for an outline of said shoulder region within said first layer; and,
means for adjusting a location for said focal region relative to said shoulder region.

24. The method of claim 20 and further comprising receiving a signal for switching among said first and second layers.

25. The method of claim 20 and further comprising receiving a signal for selecting among said first and second layers.

26. The method of claim 20 and further comprising receiving a signal for selecting a folded distorted image in which said magnified region is repositioned.

27. The method of claim 26 wherein said folded distorted image includes a second magnified region for said region in said second layer.

28. The method of claim 27 wherein said magnified region in said folded distorted region is repositioned by folding away from an original position relative to said compressed region to accommodate said second magnified region.

29. The method of claim 28 wherein said second magnified region is located at said original position and wherein said second magnified region has said magnification.

30. The method of claim 20 and further comprising receiving a signal for selecting a window for display within said magnified region.

31. The method of claim 30 wherein said window displays a portion of said second layer at said magnification.

32. The method of claim 22 wherein said one or more signals are generated with a pointing device.

33. The method of claim 20 wherein said first and second layers are one or more of raster, vector, point, and geo-referenced data layers.

34. The method of claim 20 wherein said indication, region, portion, first layer, distorted image, and second layer includes a plurality of indications, regions, portions, first layers, distorted images, and second layers, respectively.

35. The method of claim 23 wherein at least some of said means are icons.

IX. EVIDENCE APPENDIX

None.

X. RELATED PROCEEDINGS APPENDIX

None.